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NOV 14 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Urban Klein
Silvanus Products, Incorporated
40 Merchant Street
St. Genevieve, Missouri 63670

RE: Silvanus Products, Incorporated
EPA I.D. #MOD09235164222
Information Pursuant to Completion
of RCRA Facility Assessment

Dear Mr. Klein:

The Environmental Protection Agency (EPA) is currently conducting a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) on the facility located at 40 Merchant Street, St. Genevieve, Missouri, which is owned and operated by Silvanus Products, Incorporated. In order to complete the RFA, we require the following information:

When reference is made to a Solid Waste Management Unit (SWMU) in this letter, the following definition shall apply:

A SWMU is any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. Examples of SWMUs include: landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, above and below ground tanks (including 90-day accumulation tanks), transfer stations, drum storage areas, and waste recycling operations. In addition, the Agency has interpreted the term to apply to areas associated with production processes which have become contaminated as a result of routine and systematic releases of hazardous waste or hazardous constituents (a product may become a waste if it is discarded or abandoned).

WSTM/RCRA/RCOM:HUFFMAN:as:11/13/91:A:\SILVRFA.LTR

RCOM	RCOM	RCRA
HUFFMAN	DOYLE	SANDERSON

DX 14
11-13-91

Chapman
Doyle
11/14/91

11/14



R00016228
RCRA Records Center

Section 3007 of RCRA, 42 USC Section 6927, provides that any person who generates, stores, treats, transports, disposes of or has handled hazardous wastes shall upon request provide information to EPA for the purposes of enforcing the provisions of Title II of RCRA. Pursuant to the provisions of Section 3007 of RCRA, Silvanus Products, Incorporated shall provide the following information to EPA:

1. A map of the entire facility clearly labeling property boundaries, buildings, and all SWMUs, present and past. This map shall indicate the scale and/or be adequately dimensioned.
2. A detailed list of all SWMUs. Each SWMU shall be labeled and clearly identified on a facility map. Include the following information for each SWMU:
 - description of SWMU, (supply any available drawings),
 - whether there is/was secondary containment,
 - volume of SWMU,
 - current contents of SWMU,
 - material of construction,
 - date(s) of installation,
 - historical contents,
 - historical use,
 - date of closure,
 - closure procedures,
 - date(s) and quantity(ies) of any releases of hazardous waste or hazardous constituents,
 - corrective measures or response to release(s).

In regard to any prior release described above, provide for each unit any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. In responding, focus on concentrations of hazardous wastes or hazardous constituents present in contaminated soil, groundwater, surface water, and/or air.

Your facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to EPA, a cover sheet, stamped or printed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

EPA hereby requests that the information requested above be furnished within twenty (20) days of your receipt of this letter. Your failure to respond with complete and accurate information may subject you to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. Such enforcement action may include the assessment of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance.

You are requested to submit this information to:

Diane Huffman
Compliance Section, RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

If you have any questions in regard to this letter, please contact Diane Huffman, of my staff, at (913) 551-7544.

Sincerely yours,

Michael J. Sanderson
Chief, RCRA Branch

cc: Ken Volmert ✓
Missouri Department of Natural Resources

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

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(Extra charge)

3. Article Addressed to:

Urban Klein

Silvanus Products, Incorporated

40 Merchant Street

St. Genevieve, Missouri 63670

4. Article Number

P 679 715 003

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Jeri A. Wipfler

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Environmental Protection Agency

WSTM/RCOM

726 Minnesota Avenue

Kansas City, Kansas 66101



Huffman

P 679 715 003



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(See Reverse)

Urban Klein
Silvanus Products, Inc.

40 Merchant Street
St. Genevieve, Missouri

P.O., State & ZIP Code 63670

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PS Form 3800, June 1990